

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
DURHAM DIVISION

In Re:

Freda M. Channelle

Social Security No. xxx-xx-2439
Address: 1206 Fleetwood St., Durham, NC 27701-

Case No. 11-80706

Chapter 13

Debtor

OBJECTION TO CLAIM

NOW COMES the Debtor above-named, through counsel, pursuant to 11 U.S.C. §502 and Bankruptcy Rule 3007, who respectfully objects to the proof of claim filed by the creditor HSBC MORTGAGE SERVICES, INC. and dated June 6, 2011, for the following reasons:

1. The Proof of Claim asserts a monthly on-going payment of \$712.96.
2. The last statements the Debtor received from HSBC Mortgage Services, Inc., by way of its affiliate/subsidiary Beneficial, asserted a monthly payment of \$527.07, as evidenced by the attached statement, attached hereto and incorporated by reference as Exhibit A.

WHEREFORE, the Debtor prays that the Court enter an Order reducing the claim to the sum of \$572.07.

Dated: July 13, 2011

LAW OFFICES OF JOHN T. ORCUTT, P.C.

/s Edward Boltz
Edward Boltz
N.C. State Bar No. 23003
6616-203 Six Forks Road
Raleigh, N.C. 27615
(919) 847-9750

claimomd.wpt (rev. 9/28/10)

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CERTIFICATE OF SERVICE

I, Renee Nolte, certify under penalty of perjury that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age and that on July 13, 2011. I served copies of the foregoing **OBJECTION TO CLAIM** electronically or, when unable, by regular first-class U.S. mail, addressed to the following parties:

HSBC MORTGAGE SERVICES, INC.

Attn: Managing Agent

Attn: Managing Agent

Post Office Box 21188

Eagan, MN 55121-

U.S. Bankruptcy Administrator

Richard M. Hutson, II

Chapter 13 Trustee

/s Renee Nolte

Renee Nolte